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August 13, 2021

By ECF

Ruby J. Krajick
Clerk of Court
The United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *ExxonMobil Oil Corporation v. TIG Insurance Company*, 16-cv-9527 (ER)

Dear Ms. Krajick:

We represent Respondent TIG Insurance Company in the above-captioned matter and write in response to your letter of July 29, 2021 (Dkt. No. 56). We very much appreciate the opportunity to respond. Having considered the disclosure of Judge Ramos's stock ownership in Petitioner ExxonMobil Oil Corporation, Respondent believes that this conflict requires vacatur of certain orders and the final judgment issued by Judge Ramos. Accordingly, Respondent has filed today a motion to vacate, which, we understand from your letter, will be decided by a different judge.

I note that Respondent had appealed from the final judgment to the United States Court of Appeals for the Second Circuit (Dkt. No. 53). Respondent has therefore also filed a motion to hold the appeal in abeyance pending determination of its motion to vacate.

Please let us know if we can be of any further assistance.

Respectfully submitted,

/s/ Daniel P. Goldberg
Daniel P. Goldberg

cc: Counsel of Record